

**To:** Moler, Robert[Moler.Robert@epa.gov]; 'Miske, Caryn'[CMiske@mt.gov]  
**From:** Steve Ackerlund  
**Sent:** Thur 9/29/2016 4:33:56 PM  
**Subject:** tonight's CTAC meeting

Robert and Caryn,

For a number of reasons, including that Susan Nicosia will not be attending, I am not going to be able to attend tonight's public meeting in Columbia Falls. Mike Sheppard had suggested via email that I do attend a public meeting at some point and that I should specifically seek an introduction with Susan. I have so far been unable to reach Susan, but I do hope to attend the next meeting.

Caryn and I have discussed public engagement strategies and benefits before, along with Julie DalSoglio, and out of that background a genuine interest in wanting this fresh new undertaking to become all it can, I hope you won't think the worse of me for sharing thoughts that I feel are timely.

There is no better time or way that I can think of to get this project moving in positive, constructive, community-centered way then to get a TAG up and running in the next 6-9 months. Here's why:

- TAG provides the greatest autonomy and flexibility to citizens in shaping community involvement on their terms. Conversely, it does require the most effort by the community, which should be recognized a good thing – i.e. that motivation has been instilled.
- TAG can provide part-time administrative type employment to a local resident.
- TAG takes time to get in place, and once in-place it only needs to be active if there are important things to do. So there is not waste of resources to getting started early, but plenty of potential benefits as the rest of the bullets present.
- Early engagement through strong leadership that the TAG can provide is perhaps the most important factor in establishing a working relationship that gives the local community a "seat at the table" in deciding what is going to be done and why, rather than the more typical responding to actions after scoping, decision and report writing is done. This is critical to transparent and meaningful participation. If the community waits till problems emerge, experience demonstrates that is extremely difficult to establish the same quality of effective, collaborative working relationships. We were able to do so for the Upper Tenmile project, but that relatively small project is an exception.
- We have discussed the possibility of Community Visioning. The TAG, among

other options, can be used to lead this effort. I believe such work needs to be further piloted and considered for standard practice in the earliest stage of many Superfund projects. It's particularly relevant to CFAC it seems because certain large fractions of the community may care more about redevelopment, historical preservation and jobs, to name a few examples, than about public health and the environment. There is no better time than now to frame the project in terms that matter most to the community. This worked very well in Black Eagle to generate the highest level of sustained and constructive community interest in a Superfund project that I have experienced.

- Visioning has technical relevance as well. Work plans to do site investigation are being developed now to meet certain future expected needs. Important among them is risk assessment. Risk assessment assumes certain kinds of future site use. Early identification of site uses can bring focus and expediency to the early phases of the Superfund process. It also creates opportunities for leveraging Superfund to meet expanded community needs, like remediating a site in a manner that minimizes costs for site reuse.

- TAG can also be an effective forum for considering and pursuing as needed other Superfund resources such as Cooperative Agreements, training grants to enable locals to work on the projects, and shaping future construction work for maximum suitability for local contractors. These things take time to put in place and should also be considered in the earliest stages of Superfund work to achieve maximum effectiveness.

- The standard practice among technical staff who lead Superfund efforts is to focus the work within the narrow mandate of public health and the environment and presume that they must first generate and interpret information to be presented to the public. This is the implicit training and innate behavior of technical people, but it is antithetical to generally accepted practices in public participation.

Typically, the energy is not there to engage a community to organize and present their voice until later in the process when things don't meet their expectations. This wait-and-see approach ends up causing everyone to blame the agency for the shortfalls. But on reflection, it seems to me much of the problem comes from late and/or ineffective engagement in the project on behalf of the community. I encourage you to try and not let that happen here.

Best!

Steve Ackerlund, PhD

Environmental Consultant

Ackerlund, Inc.

406-461-6354